

United States Courts
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MAY 25 2016

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

ERIC BEVERLY,
GREGORY BABERS,
JULIEN FRANCIS,
and
JARRICK HOSKINS,
Defendants

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CRIMINAL NO.:

16 CR 0215

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Commit Armed Bank Robbery)

From on or about July 25, 2014 through on or about May 2, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

ERIC BEVERLY,
GREGORY BABERS,
JULIEN FRANCIS,
and
JARRICK HOSKINS,

did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown to the Grand Jury, to commit offenses against the United States, to wit: Bank Robbery, that is, to take, by force, violence, and intimidation, from the presence or person of another, money, that was in the care,

custody, control, management and possession of one or more banks whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such an offense, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm, in violation of Title 18, United States Code, Sections 2113(a) and 2113(d).

The Manner and Means of the Conspiracy

1. It was part of the conspiracy that two or more conspirators, known and unknown to the Grand Jury, while wearing masks would enter banks during the commission of take-over style armed robberies.

2. It was further part of the conspiracy that one or more conspirators would brandish firearms during the robberies, putting lives of persons in jeopardy.

3. It was further part of the conspiracy that, during the commission of the armed bank robberies, one or more conspirators would jump over the teller counter and grab money from the teller drawers while another armed conspirator would hold up the lobby of the bank.

4. It was further part of the conspiracy that conspirators would use getaway vehicles after exiting the banks, and would sometimes drive to a second location and then transfer to "switch" cars.

5. It was further part of the conspiracy that one or more conspirator would occasionally "case" the robbery location prior to the commission of the armed robbery.

6. It was further part of the conspiracy that conspirators would communicate with each other via cell phone in furtherance of the armed robberies.

Overt Acts

In furtherance of the conspiracy described herein, and to effect and accomplish the objects of the conspiracy, one or more of the conspirators did commit and cause to be committed, the following overt acts, among others, in the Southern District of Texas and elsewhere:

1. On or about July 25, 2014, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Allegiance Bank, a federally insured financial institution located at 8727 West Sam Houston Parkway North, in Houston, Texas, stole approximately \$4,925 in federally insured deposits and fled the scene.

2. On or about August 6, 2014, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Icon Bank, a federally insured financial institution located at 7908 North Sam Houston Parkway West, in Houston, Texas, stole

approximately \$8,411 in federally insured deposits and fled the scene.

3. On or about August 19, 2014, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Frost Bank, a federally insured financial institution located at 9821 Katy Freeway, in Houston, Texas, stole approximately \$27,680 in federally insured deposits and fled the scene.

4. On or about August 25, 2014, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Chasewood Bank, a federally insured financial institution located at 20333 State Highway 249, in Houston, Texas, stole approximately \$21,146 in federally insured deposits and fled the scene in a stolen Ford Expedition.

5. On or about August 25, 2014, one of the occupants in the stolen Ford Expedition exited the vehicle and fired several shots into the air before both occupants jumped into a Chevrolet Suburban driven by a third conspirator and fled.

6. On or about September 18, 2014, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Comerica Bank, a federally insured financial institution located at 2950 North Loop West, #2, in Houston, Texas, stole

approximately \$9,940 in federally insured deposits and fled the scene.

7. On or about November 26, 2014, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Wells Fargo Bank, a federally insured financial institution located at 910 Fairmont Parkway, in Pasadena, Texas, stole approximately \$22,146 in federally insured deposits and fled the scene.

8. On or about December 27, 2014, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered JP Morgan Chase Bank, a federally insured financial institution located at 5510 Memorial Drive, in Houston, Texas, stole approximately \$11,597 in federally insured deposits and fled the scene.

9. On or about January 6, 2015, co-conspirator Jeremy Marcell Davis and defendant **ERIC BEVERLY** entered Comerica Bank, a federally insured financial institution located at 2401 Fountain View Drive, #100, in Houston, Texas, stole approximately \$9,048 in federally insured deposits and fled the scene.

10. On or about January 20, 2015, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Regions Bank, a federally insured financial institution

located at 5055 Woodway Drive, in Houston, Texas, stole approximately \$7,149 in federally insured deposits and fled the scene.

11. On or about January 24, 2015, co-conspirator Jeremy Marcell Davis and defendant **ERIC BEVERLY**, wearing masks, were observed exiting a gray Chevrolet Impala bearing covered license plates and entered Amegy Bank, a federally insured financial institution located at 800 Town and Country Boulevard, Suite 110, in Houston, Texas, and stole approximately \$9,114 in federally insured deposits and fled the scene.

12. On or about January 24, 2015, during the commission of the takeover-style armed robbery, co-conspirator Jeremy Marcell Davis jumped over the teller counter, and, in doing so, placed an ungloved hand on the counter, leaving a latent print which was recovered, processed and determined to match palm print records belonging to the Jeremy Marcell Davis.

13. On or about January 24, 2015, an Infiniti SUV bearing Texas license plate number BLM9864 was observed in the vicinity of the Amegy Bank at or near the time that the armed robbery occurred.

14. On or about February 4, 2015, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Patriot Bank, a federally insured financial institution

located at 5900 Memorial Drive, in Houston, Texas, stole approximately \$2,752 in federally insured deposits and fled the scene.

15. On or about February 14, 2015, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered BBVA Compass Bank, a federally insured financial institution located at 6375 Woodway Drive, in Houston, Texas, stole approximately \$15,580 in federally insured deposits and fled the scene in a black Dodge truck bearing paper plates.

16. On or about February 25, 2015, co-conspirator Jeremy Marcell Davis and defendant **ERIC BEVERLY** entered Wells Fargo Bank, a federally insured financial institution located at 1160 Dairy Ashford, Suite 100, in Houston, Texas, stole approximately \$5,270 in federally insured deposits and fled in a black Dodge truck sporting running boards (or "nerf bars").

17. On or about March 5, 2015, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered BBVA Compass Bank, a federally insured financial institution located at 14121 North Southwest Freeway, Suite A, in Sugar Land, Texas, stole approximately \$4,986 in federally insured deposits and fled the scene in a black Dodge truck sporting nerf bars.

18. On or about March 9, 2015, co-conspirator Jeremy

Marcell Davis and defendant **ERIC BEVERLY** entered Zales, located at 1664 Willowbrook Mall, in Houston, Texas, stole jewelry valued at approximately \$145,602 and fled the scene.

19. On or about March 20, 2015, co-conspirator Jeremy Marcell Davis with defendants **ERIC BEVERLY** and **JARRICK HOSKINS** entered Lone Star National Bank, a federally insured financial institution located at 10000 San Pedro, in San Antonio, Texas, wherein they forced employees to open the teller drawers and stole approximately \$23,000 in federally insured deposits. Co-conspirator Jeremy Marcell Davis with defendants, **ERIC BEVERLY** and **JARRICK HOSKINS** fled in a black 2011 Dodge Ram 1500 truck bearing Texas license plate number FGP0681, with chrome nerf bars, two bullet holes on the driver's side near the rear of the bed, and a dent with white paint transfer under the driver's side break light, which was determined to be registered to the mother of co-conspirator Jeremy Marcell Davis.

20. On or about March 30, 2015, co-conspirator Jeremy Marcell Davis and defendant **ERIC BEVERLY** entered Helzberg Diamonds, located at 16535 North Southwest Freeway, in Sugar Land, Texas, stole jewelry valued at approximately \$94,110 and fled the scene.

21. On or about April 10, 2015, co-conspirator Jeremy Marcell Davis and defendant **ERIC BEVERLY** entered Jared Vault,

located at 5000 Katy Mills Circle, Suite 440, in Katy, Texas, stole jewelry valued at approximately \$42,750 and fled the scene.

22. On or about April 10, 2015, a gray Chevrolet Impala and a Dodge truck were observed in the vicinity of the Katy Mills Mall at or near the time that the robbery of Jared Vault occurred.

23. On or about April 15, 2015, co-conspirator Jeremy Marcell Davis with defendants **ERIC BEVERLY** and **JARRICK HOSKINS** entered JP Morgan Chase Bank, a federally insured financial institution located at 5510 Memorial Drive, in Houston, Texas, stole approximately \$34,260 in federally insured deposits and fled the scene.

24. On or about April 15, 2015, during the commission of the takeover-style armed bank robbery, defendants **JARRICK HOSKINS** and **ERIC BEVERLY**, wearing masks, jumped over the teller counter while co-conspirator Jeremy Marcell Davis brandished a firearm in the bank lobby wearing only one glove.

25. On or about April 15, 2015, defendants **JARRICK HOSKINS** and **ERIC BEVERLY** with co-conspirator Jeremy Marcell Davis exited JP Morgan Chase Bank through a glass door, from which latent prints were recovered, processed and determined to match the

finger and palm prints records belonging to co-conspirator Jeremy Marcell Davis.

26. On or about April 24, 2015, **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered Chasewood Bank, a federally insured financial institution located at 20333 State Highway 249, in Houston, Texas - the same bank that had been robbed on August 25, 2014 - and stole approximately \$22,146 in federally insured deposits and fled in a black Dodge truck sporting chrome nerf bars and a paper-covered license plate. A gray Chevrolet Impala was also observed several times in the vicinity of the Chasewood Bank at or near the time that the armed robbery occurred.

27. On or about April 24, 2015, during the commission of the armed robbery, one of the conspirators jumped over the counter and yelled, "haha, got you again."

28. On or about April 28, 2015, a stolen Honda CRV was utilized in two attempted armed bank robberies occurring within thirty minutes of each other. While defendant **JARRICK HOSKINS** stayed in the vehicle, defendant **ERIC BEVERLY** and co-conspirator Jeremy Marcell Davis, wearing masks and armed, entered Wells Fargo Bank, a federally insured financial institution located at 6161 Savoy Drive, Suite 100, in Houston, Texas, but were thwarted by "bandit barriers" located inside the bank. Less

than thirty minutes later, defendant **ERIC BEVERLY** and a co-conspirator known to the Grand Jury, now deceased, entered JP Morgan Chase Bank, a federally insured financial institution located at 5177 Richmond Avenue, in Houston, Texas, but fled back to the stolen Honda CRV after an off-duty Harris County Deputy drew his weapon on them.

29. On or about April 28, 2015, three conspirators were thereafter observed exiting the stolen vehicle at a "switch location" and entering a black Dodge Ram 1500 truck with nerf bars, two bullet holes on the driver's side of the truck near the rear of the bed and a dent with white paint transfer under the driver's side break light.

30. On or about May 2, 2015, co-conspirator Jeremy Marcell Davis and defendant **ERIC BEVERLY** entered Comerica Bank, a federally insured financial institution located at 2401 Fountain View Drive, in Houston, Texas - the same bank that had been robbed on January 6, 2015 - and stole approximately \$5,000 in federally insured deposits and fled the scene.

31. Vehicle records indicate a co-conspirator known to the Grand Jury, now deceased, was the registered owner of a gray 2009 Chevrolet Impala, which matched the description of vehicle used in connection with the armed robberies of Amegy Bank located at 800 Town and Country Boulevard on or about January

24, 2015, Jared Vault located at 5000 Katy Mills Circle on or about April 10, 2015, and Chasewood Bank located at 20333 State Highway 249 on or about April 24, 2015.

32. The Infiniti SUV bearing Texas license plate number BLM9864 associated with defendant, **ERIC BEVERLY** matched the description of the vehicle used in connection with the armed robbery of Amegy Bank located at 800 Town and Country Boulevard on or about January 24, 2015.

33. The Chevy Suburban registered to defendant **GREGORY BABERS'** stepfather matched the description of a vehicle used in connection with the armed robbery of Chasewood Bank located at 20333 State Highway 249 on or about August 25, 2014.

34. At the time of his arrest on or about May 5, 2015, co-conspirator Jeremy Marcell Davis was driving the same 2011 Dodge Ram 1500 truck bearing Texas license plate number FGP0681 identified in connection with the armed robbery of Lone Star National Bank in San Antonio that occurred on March 20, 2015, and which matched the description of the Dodge Ram used in connection with the armed robberies of BBVA Compass Bank located at 6375 Woodway Drive on or about February 14, 2015, Wells Fargo Bank located at 1160 Dairy Ashford on or about February 25, 2015, BBVA Compass Bank located at 14121 N. Southwest Freeway on or about March 5, 2015, Chasewood Bank located at 20333 State

Highway 249 on or about April 24, 2015, and the attempted armed robbery of JP Morgan Chase Bank located at 5177 Richmond Avenue on or about April 28, 2015.

35. At the time of his arrest on or about May 5, 2015, co-conspirator Jeremy Marcell Davis was in possession of an iPhone 6, records for which indicate the phone was at or near JP Morgan Chase Bank located at 5510 Memorial Drive on or about April 15, 2015, Chasewood Bank located at 20333 State Highway 249 on or about April 24, 2015, Wells Fargo Bank located at 6161 Savoy Drive Suite 100 and JP Morgan Chase Bank located at 5177 Richmond Avenue on or about April 28, 2015, and Comerica Bank located at 2401 Fountain View Drive on or about May 2, 2015, within minutes of the armed robberies at those locations.

36. Records for a cellular telephone subscribed to by a deceased co-conspirator indicate the phone was used at or near Amegy Bank located at 800 Town and Country Boulevard, Suite 110, within minutes of the armed robbery at that location, and that calls were placed from this phone to phone numbers subscribed to by defendants **ERIC BEVERLY** and **JULIAN FRANCIS**.

37. Records for a cellular telephone subscribed to by a deceased co-conspirator further indicate that the phone was used at or near BBVA Compass Bank located at 6375 Woodway Drive on or about February 14, 2015, BBVA Compass Bank located at 14121

North Southwest Freeway on or about March 5, 2015, Lone Star National Bank located at 10000 San Pedro in San Antonio on or about March 20, 2015, and JP Morgan Chase Bank located at 5510 Memorial Drive on or about April 15, 2015, within minutes of the robberies at those locations.

38. Records for one or more cellular telephones subscribed to by defendant **ERIC BEVERLY** indicate that the phones were used at or near BBVA Compass Bank located at 6375 Woodway Drive on or about February 14, 2015, BBVA Compass Bank located at 14121 North Southwest Freeway on or about March 5, 2015, JP Morgan Chase Bank located at 5510 Memorial Drive on or about April 15, 2015, Chasewood Bank located at 20333 State Highway 249 on or about April 24, 2015, Wells Fargo Bank located at 6161 Savoy Drive Suite 100 and JP Morgan Chase Bank located at 5177 Richmond Avenue on or about April 28, 2015, and Comerica Bank located at 2401 Fountain View Drive on or about May 2, 2015, within minutes of the armed robberies at those locations.

39. Records for a cellular telephone subscribed to by defendant **GREGORY BABERS** indicate that the phone was used at or near JP Morgan Chase Bank located at 5510 Memorial Drive on or about April 15, 2015, Chasewood Bank located at 20333 State Highway 249 on or about April 24, 2015, Wells Fargo Bank located at 6161 Savoy Drive Suite 100 and JP Morgan Chase Bank located

at 5177 Richmond Avenue on or about April 28, 2015, and Comerica Bank located at 2401 Fountain View Drive on or about May 2, 2015, within minutes of the armed robberies at those locations.

40. Records for a cellular telephone subscribed to by defendant **JULIEN FRANCIS** indicate that the phone was used at or near JP Morgan Chase Bank located at 5510 Memorial Drive on or about April 15, 2015, and Chasewood Bank located at 20333 State Highway 249 on or about April 24, 2015, within minutes of the armed robberies at those locations.

41. Records for a cellular telephone utilized by defendant **JARRICK HOSKINS** indicate that the phone was used at or near JP Morgan Chase Bank located at 5510 Memorial Drive on or about April 15, 2015, Wells Fargo Bank located at 6161 Savoy Drive Suite 100 and JP Morgan Chase Bank located at 5177 Richmond Avenue on or about April 28, 2015, and Comerica Bank located at 2401 Fountain View Drive on or about May 2, 2015, within minutes of the armed robberies at those locations.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(Armed Bank Robbery)

On or about January 24, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
and
JULIEN FRANCIS,**

did aid and abet others known and unknown to the grand jury and did knowingly and intentionally take, by force, violence and intimidation, from the person or presence of another, approximately \$9,114.00 in United States currency, belonging to and in the care, custody, control, management, and possession of Amegy Bank, located at 800 Town and Country Boulevard, Suite 110, in Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants did aid and abet others and did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT THREE

(Brandishing a Firearm during a Crime of Violence)

On or about January 24, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
and
JULIEN FRANCIS,**

did aid and abet others known and unknown to the grand jury to knowingly carry and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which one or more of them may be prosecuted in a court of the United States, to wit: robbery of a bank, in violation of United States Code, Section 2113(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOUR

(Armed Bank Robbery)

On or about February 14, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
and
JARRICK HOSKINS**

did aid and abet others known and unknown to the grand jury and did knowingly and intentionally take, by force, violence and intimidation, from the person or presence of another, approximately \$15,580.00 in United States currency, belonging to and in the care, custody, control, management, and possession of BBVA Compass Bank, located at 6375 Woodway Drive, in Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants did aid and abet others and did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT FIVE

(Brandishing a Firearm during a Crime of Violence)

On or about February 14, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
and
JARRICK HOSKINS**

did aid and abet others known and unknown to the grand jury to knowingly carry and brandish a firearm, namely, a handgun,

during and in relationship to a crime of violence for which one or more of them may be prosecuted in a court of the United States, to wit: robbery of a bank, in violation of United States Code, Section 2113(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT SIX

(Armed Bank Robbery)

On or about March 5, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
JULIEN FRANCIS
and
JARRICK HOSKINS**

did aid and abet others known and unknown to the grand jury and did knowingly and intentionally take, by force, violence and intimidation, from the person or presence of another, approximately \$4,986.00 in United States currency, belonging to and in the care, custody, control, management, and possession of BBVA Compass Bank, located at 14121 North Southwest freeway, Suite A, in Sugar Land, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants did aid and abet

others and did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT SEVEN

(Brandishing a Firearm during a Crime of Violence)

On or about March 5, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
JULIAN FRANCIS,
and
JARRICK HOSKINS**

did aid and abet others known and unknown to the grand jury to knowingly carry and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which one or more of them may be prosecuted in a court of the United States, to wit: robbery of a bank, in violation of United States Code, Section 2113(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT EIGHT

(Armed Bank Robbery)

On or about April 15, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

ERIC BEVERLY,
GREGORY BABERS,
JULIEN FRANCIS,
and
JARRICK HOSKINS,

did aid and abet others known and unknown to the grand jury and did knowingly and intentionally take, by force, violence and intimidation, from the person or presence of another, approximately \$34,260.00 in United States currency, belonging to and in the care, custody, control, management, and possession of JP Morgan Chase Bank, located at 5510 Memorial Drive, in Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants did aid and abet others and did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT NINE

(Brandishing a Firearm during a Crime of Violence)

On or about April 15, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
JULIEN FRANCIS,
and
JARRICK HOSKINS,**

did aid and abet others known and unknown to the grand jury to knowingly carry and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which one or more of them may be prosecuted in a court of the United States, to wit: robbery of a bank, in violation of United States Code, Section 2113(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TEN

(Armed Bank Robbery)

On or about April 24, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
and
JULIEN FRANCIS,**

did aid and abet others known and unknown to the grand jury and did knowingly and intentionally take, by force, violence and intimidation, from the person or presence of another, approximately \$22,146.00 in United States currency, belonging to and in the care, custody, control, management, and possession of Chasewood Bank, located at 20333 State Highway 249, Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants did aid and abet others and did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT ELEVEN

(Brandishing a Firearm during a Crime of Violence)

On or about April 24, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
and
JULIEN FRANCIS,**

did aid and abet others known and unknown to the grand jury to knowingly carry and brandish a firearm, namely, a handgun,

during and in relationship to a crime of violence for which one or more of them may be prosecuted in a court of the United States, to wit: robbery of a bank, in violation of United States Code, Section 2113(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT TWELVE

(Armed Bank Robbery Attempt)

On or about April 28, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
JULIEN FRANCIS
and
JARRICK HOSKINS,**

did aid and abet others known and unknown to the grand jury and did knowingly and intentionally attempt to take, by force, violence and intimidation, from the person or presence of another, United States currency, belonging to and in the care, custody, control, management, and possession of Wells Fargo Bank, located at 6161 Savoy Drive, Suite 100, Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants did aid and abet and did assault and put in

jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT THIRTEEN

(Brandishing a Firearm during a Crime of Violence)

On or about April 28, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
JULIEN FRANCIS
and
JARRICK HOSKINS,**

did aid and abet others known and unknown to the grand jury to knowingly carry and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which one or more of them may be prosecuted in a court of the United States, to wit: attempted robbery of a bank, in violation of United States Code, Section 2113(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOURTEEN

(Armed Bank Robbery)

On or about May 2, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

**ERIC BEVERLY,
GREGORY BABERS,
and
JARRICK HOSKINS,**

did aid and abet others known and unknown to the grand jury and did knowingly and intentionally take, by force, violence and intimidation, from the person or presence of another, approximately \$5,000.00 in United States currency, belonging to and in the care, custody, control, management, and possession of Comerica Bank, located at 2401 Fountain View Drive, Houston, Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and in committing such offense, the defendants did aid and abet and did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm.

In violation of Title 18, United States Code, Sections 2113(a), 2113(d) and 2.

COUNT FIFTEEN

(Brandishing a Firearm during a Crime of Violence)

On or about May 2, 2015, in the Southern District of Texas and within the jurisdiction of the court, the defendants,

ERIC BEVERLY,
GREGORY BABERS,
and
JARRICK HOSKINS,

did aid and abet others known and unknown to the grand jury to knowingly carry and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which one or more of them may be prosecuted in a court of the United States, to wit: robbery of a bank, in violation of United States Code, Section 2113(a).


All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

A TRUE BILL:

Original Signature on File
FORERPERSON OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

BY:


CARRIE WIRSING
Assistant United States Attorney